

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

UNITED STATES OF AMERICA

PLAINTIFF

V.

CRIMINAL NO.: 3:14-CR-78 TSL-FKB

WILLIAM DAVID DICKSON,
a/k/a Butch Dickson

DEFENDANT

SUPPLEMENTAL MOTION FOR REVIEW OF DETENTION ORDER

COMES NOW, William David Dickson, Defendant herein, and files this his Supplemental Motion for Review of Detention Order in light of changed circumstances, and would show unto the Court as follows:

1. That the Defendant was initially ordered detained by the Magistrate Judge in the United States District Court for the Southern District of Florida.

2. Thereafter, the Defendant was transported to the Southern District of Mississippi, where the above entitled indictment had been returned against him.

3. That thereafter, following his return to this District, the Defendant filed a motion appealing his detention to the District Judge. The United States Attorney responded and that Motion for Review of the Detention Order has not been ruled on.

4. That since the filing of that Motion for Review of Detention Order, the Defendant has worked with defense counsel, the U.S. Attorney's office and the Office of the Bankruptcy Trustee, to seek the return of funds transferred to a bank in Panama.

5. With the Defendant in custody, this has been a tedious endeavor, however, at present approximately five million dollars has been transferred back to the United States from the bank in

Panama through the efforts of the Defendant, and he remains committed to effecting the return of the balance of the funds into the account of the Bankruptcy Trustee.

6. The Defendant would respectfully show that if he were to be released on conditions to include that he remain within his residence at all times, subject to electronic monitoring as well as 24-hour a day observation by third-party custodians, for which both his son and daughter, who are both local residents, have volunteered.

7. Further, as an additional condition of his release, the Defendant is willing to bear the expense of round-the-clock security to be provided by Security Support Services.

8. That the Defendant, during this time, will continue to work with the Bankruptcy Trustee and others to effect the return of the balance of the funds on deposit in Panama.

9. That his release will also enable the Defendant to be able to review the voluminous discovery which the government has provided to the defense in this case.

10. Your Defendant respectfully would show that Title 18, § 3142(i) provides that the Court “may, by subsequent order, permit the temporary release of the person, in the custody of a United States Marshal or another appropriate person, to the extent that the judicial officer determines such release to be necessary for preparation of the person’s defense or for another compelling reason.”

That based on the foregoing, your Defendant respectfully requests this honorable Court to schedule a hearing on this motion in order to allow testimony in support thereof; and to review the detention order entered herein and to modify it to allow his release on the conditions set forth herein, at least on a temporary basis until the balance of the funds in Panama have been returned and the Defendant has had adequate time to conduct a review of the discovery in this case with his attorneys.

RESPECTFULLY SUBMITTED, this the 18th day of July, 2014.

/s/ Joe M. Hollomon
JOE M. HOLLOMON, ESQ.

/s/ Luke Dove
LUKE DOVE, ESQ.

ATTORNEYS FOR AND ON BEHALF
OF WILLIAM DAVID DICKSON

OF COUNSEL:

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CERTIFICATE OF SERVICE

I, Joe M. Hollomon, do hereby certify that I have this date electronically filed the foregoing *Supplemental Motion for Review of Detention Order* with the Clerk of the Court using the Electronic Case Filing (ECF) system, which sent notification of such filing to all counsel of record.

THIS, the 18th day of July, 2014.

/s/ Joe M. Hollomon
JOE M. HOLLOMON, ESQ.